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The Administrative Record Staff



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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MAR 12 1987

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Mr. John Krueger  
Department of Energy  
Rocky Flats Plant  
P.O. Box 928  
Golden, Colorado 80402

Dear Peter and John:

I am providing to you my summary notes of our meeting of March 4, 1987.  
A list of attendees is attached.

The following items were discussed:

- 1) The schedule for submittal of RI on 881 Hillside is very tight. DOE intends to meet the July 1, 1987 deadline, even if it is only a preliminary report with a description of additional work needed to complete the study. Rockwell stated that any unexpected events may delay the project and the schedule does not allow adequate time for substantial public input.
- 2) The EPA Groundwater Task Force wants to be on-site in April. This may present problems to Rockwell and impact the tight schedules if the Task Force expects much support.
- 3) The feasibility study portion of the plan does not include SARA requirements. Rockwell will look into the matter but has so far treated these sites as RCRA corrective action only. EPA's view is that SARA requirements apply to these sites as well. Pertinent summaries of SARA requirements will be provided by EPA to Tom Greengard through John Krueger.
- 4) Major problems on QA/QC were discussed by Rolle Grabbe. The absence of acceptance criteria for the data is a notable omission. Rolle will provide Tom Greengard with an EPA checklist and will follow up with a Rockwell designated contact point.

"REVIEWED FOR CLASSIFICATION

ADMIN RECORD

By R. B. Hoffman

Date 6/19/90

"REVIEWED FOR CLASSIFICATION

By J. C. [Signature]

Date 6/2/90

BLH/MS  
UCM/6/2/90

- 5) John Krueger will be the DOE contact for all RI/FS work. He will be providing a directory of DOE/Rockwell staff involved in various aspects of the project. EPA will provide its directory to DOE.
- 6) EPA/CDH need to know detailed schedules for field work to know when to have people available to observe sampling/well construction/surveying./etc. Tom Greengard will supply such a schedule as soon as it is available.
- 7) Questions were asked about the criteria for selecting the 881 Hillside as the top priority site. Rockwell stated that the samples collected last summer at this location contained high levels of TCE in groundwater and that the sites are located in a drainage which flows into Ralston Reservoir, although no soil gas samples showed contamination at the plant boundary. It was determined that the site posed the greatest risk to public health of all the ones identified.
- 8) CDH reported that it is looking into revitalizing the RF Monitoring Committee into a forum for discussion of such items as the RI/FS workplans, permits, and other items of public interest. The Data Exchange Meetings would then be limited to a technical agenda. Everyone was in agreement with that effort.
- 9) The format of the workplans was felt to be somewhat confusing. Rockwell agreed to develop a summary document which could then be distributed to the public.
- 10) There was some discussion of the omission of any work elements to define the air pathway and the issue of the respirable particle size cutoff as described in other studies. The air pathway must be looked at as part of an endangerment assessment. In addition the effect of any disturbance to soil cover during any remedial action must be looked at during the FS.
- 11) EPA agreed to a 2-week turnaround on comments to DOE so that work can proceed expeditiously.
- 12) The Workplans do not address the fact that any remedies selected must meet applicable or relevant and appropriate requirements (ARAR's). It would be useful to scope out which ARAR's might be used at the site because the analytical procedures, such as minimum detectable concentrations might have to be adjusted depending upon the form of such ARAR's.

If you have any comments or differing interpretations of the substance of the discussions, particularly regarding action items for any of us, please let me know.

Sincerely yours,



Barry Levene  
Remedial Project Manager

Att.

cc: EPA Rocky Flats Team  
Patty Fuller, CDM

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